

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Todd Runnels,

Plaintiff,

v.

Enhanced Recovery Company, LLC; and
DOES 1-10, inclusive,

Defendants.

Civil Action No.: 1:13-cv-00426-JTN

**NOTICE OF WITHDRAWAL OF COMPLAINT AND VOLUNTARY
DISMISSAL OF ACTION WITH PREJUDICE
PURSUANT TO RULE 41(a)**

Todd Runnels ("Plaintiff"), by Plaintiff's attorney, hereby withdraws the complaint and voluntarily dismisses this action, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: June 18, 2013

Respectfully submitted,

By: /s/ Sergei Lemberg

Sergei Lemberg, Esq.
Lemberg & Associates L.L.C.
1100 Summer Street, 3rd Floor
Stamford, CT 06905
Telephone: (203) 653-2250
Facsimile: (203) 653-3424
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2013, a true and correct copy of the foregoing Notice of Withdrawal was served electronically by the U.S. District Court for the Western District of Michigan Electronic Document Filing System (ECF) and that the document is available on the ECF system.

By /s/ Sergei Lemberg

Sergei Lemberg, Esq.